

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA
GARRETT, ROBERT NIXON,
SAMANTHA NIXON, DAVID
BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN,
ROGELIO VARGAS, MARILYN DEWEY,
PETER ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee
limited liability company,

Defendants.

Case No. 2:23-cv-00630- JLR

STIPULATED MOTION AND [PROPOSED]
ORDER EXTENDING CASE SCHEDULE AND
CLASS CERTIFICATION DEADLINES

Noted: June 11, 2024.

STIPULATION AND [PROPOSED] ORDER EXTENDING
CASE SCHEDULE AND CLASS CERTIFICATION
DEADLINES
Case No. 2:23-cv-00630-JLR

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1 Plaintiffs Anna Patrick, Douglas Morrill, Roseanne Morrill, Leisa Garrett, Robert Nixon,
 2 Samantha Nixon, David Bottonfield, Rosemarie Bottonfield, Tasha Ryan, Rogelio Vargas,
 3 Marilyn Dewey, Peter Rollins, Rachel Rollins, Katrina Benny, Sara Erickson, Greg Largson, and
 4 James King (“Plaintiffs”) and Defendants David L. Ramsey III and the Lampo Group, LLC
 5 (“Lampo Defendants”) and Happy Hour Media Group, LLC (“Happy Hour”) (collectively, the
 6 “Parties”), hereby STIPULATE and AGREE, and so jointly move the Court, as follows:

7 WHEREAS, the Court issued an Order on February 21, 2024 (Dkt. No. 71), setting the
 8 following deadlines:

- 9 • Deadline for Plaintiffs’ disclosure of experts upon whom they may rely in connection
 with class certification: August 16, 2024
- 10 • Deadline for Defendants’ disclosure of experts upon whom they may rely in connection
 11 with class certification: October 4, 2024
- 12 • Deadline for Plaintiffs’ disclosure of rebuttal experts upon whom they may rely in
 connection with class certification: October 25, 2024
- 13 • Deadline for motions relating to admissibility of experts on issues pertaining to class
 14 certification: January 10, 2025
- 15 • Deadline for dispositive motions or motions to compel arbitration that any party
 believes are likely to affect class certification: January 10, 2025
- 16 • Deadline for responses or oppositions to motions relating to admissibility of experts on
 17 issues pertaining to class certification and/or dispositive motions or motions to compel
 18 arbitration that any party believes are likely to affect class certification: February 10,
 2025
- 19 • Deadline for replies regarding motions relating to admissibility of experts on issues
 20 pertaining to class certification and/or dispositive motions or motions to compel
 21 arbitration that any party believes are likely to affect class certification: February, 28
 2025

22 WHEREAS, the Lampo Defendants will shortly move this Court to compel arbitration as
 23 to those plaintiffs who have produced contracts containing arbitration clauses, and at this time the
 24 parties are working cooperatively to complete the first phase of discovery and schedule
 25 depositions, if the Court denies the motion to compel arbitration (and without prejudice to
 26 Defendants’ right to request a stay of all such proceedings pending arbitration);

1 WHEREAS, the Parties have conferred and agree that in light of the status of the litigation
2 at this stage, good cause exists to extend the existing case deadlines;

3 WHEREAS, the Parties agree that the Court should extend the existing case schedule and
4 set the following deadlines at this stage of litigation, without prejudice to any party's right or ability
5 to seek a stay pending any request for arbitration or other revisions to the case schedule in the
6 future:

- 7 • Deadline for Plaintiffs' disclosure of experts upon whom they may rely in connection
8 with class certification: November 21, 2024
- 9 • Deadline for Defendants' disclosure of experts upon whom they may rely in connection
10 with class certification: January 17, 2024
- 11 • Deadline for Plaintiffs' disclosure of rebuttal experts upon whom they may rely in
12 connection with class certification: February 14, 2024
- 13 • Deadline for motions relating to admissibility of experts on issues pertaining to class
14 certification: April 25, 2025
- 15 • Deadline for dispositive motions or motions to compel arbitration that any party
16 believes are likely to affect class certification: April 25, 2025¹
- 17 • Deadline for responses or oppositions to motions relating to admissibility of experts on
18 issues pertaining to class certification and/or dispositive motions or motions to compel
19 arbitration that any party believes are likely to affect class certification: May 30, 2025
- 20 • Deadline for replies regarding motions relating to admissibility of experts on issues
21 pertaining to class certification and/or dispositive motions or motions to compel
22 arbitration that any party believes are likely to affect class certification: June 20, 2025

23 WHEREAS, the Parties further agree that the following deadlines should remain in effect,
24 as ordered (*see* Dkt. Nos. 54 & 71), without prejudice to any party's right to seek a stay of such
25 deadlines pending arbitration:

- 26 • Deadline to complete discovery on class certification: 30 days after expert motions and
dispositive motions or motions to compel arbitration affecting class certification are
decided by the Court

¹ As referenced above, the Lampo Defendants anticipate filing a motion to compel arbitration near-term, rather than waiting until the stipulated deadline, having recently learned that many of the named Plaintiffs have arbitration agreements.

- Deadline for Plaintiffs to file motion for class certification: 60 days after expert motions and dispositive motions or motions to compel arbitration affecting class certification are decided by the Court

THEREFORE, the Parties stipulate and jointly move the Court for an order setting the deadlines as set forth above. This stipulation is made without prejudice to any party, individually or collectively, to seek extension of the deadlines herein, as litigation continues.

STIPULATED TO this 11th day of June, 2024.

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[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

THE HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT JUDGE